

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE

UNITED STATES OF AMERICA)

V.)

MICHAEL ALAN CROOKER)

204 Nov 2 2006
CR-04-30034-MAP
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEFENDANT'S PRO SE MOTION TO REQUIRE GOVERNMENT
DISCLOSURE TO NEW APPOINTED COUNSEL
OF SENTENCING ISSUES

The government should be required to disclose in advance to new appointed counsel any matters that it intends to raise at sentencing that is outside of the Presentence Report.

Otherwise new counsel at sentencing will have no idea what the government is talking about. New counsel will have to investigate and prepare counter-arguments to any such allegations, if there is to be any, i.e. seizure of fireworks that government calls "IED."

Respectfully submitted,



Michael Alan Crooker, pro se
CCI MacDougall
1153 East Street South
Suffield, CT 06080

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have this date mailed copies of the foregoing to Kevin O'Regan, AUSA, U.S. Attorneys, 1550 Main St., Springfield, MA 01103 and Vincent Bongiorno, Attorney, 95 State St., #309, Springfield, MA 01103.

Dated: October 31, 2006

s/ 